

**Federal Defenders
OF NEW YORK, INC.**

Southern District
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David E. Patton
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MEMO ENDORSED

Southern District of New York
Jennifer L. Brown
Attorney-in-Charge

August 18, 2020

By ECF

Honorable Valerie Caproni
United States District Judge
Southern District of New York
40 Foley Square
New York, NY 10007

USDC SDNY
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Re: *United States v. Martin Reyes*, 20 Cr. 159 (VEC)

Dear Judge Caproni:

I write to request a temporary modification to Mr. Reyes' bail conditions to allow for a one-day removal of his ankle monitor so that he can safely undergo an MRI this Friday, August 21, 2020. The Government has no objection. I have contacted Mr. Reyes' assigned Pretrial Services officer, Ashley Cosme, to learn her position on this request, but have not yet heard a response.

Mr. Reyes was arrested in connection with the above-captioned case on February 4, 2020. On February 5, 2020, he was released on bail conditions including: a \$75,000 personal recognizance bond signed by two financially responsible persons, travel limited to the Southern and Eastern Districts of New York, surrender travel documents and make no new applications, pretrial supervision as directed, drug testing/treatment as directed, mental health evaluation/treatment as directed, and home detention enforced by electronic monitoring. For the last six-and-a-half months, Mr. Reyes has resided at home with his wife, mother, and toddler without incident. He is scheduled to appear before this Court on September 21, 2020 for a change-of-plea hearing.

Mr. Reyes suffers from numerous health conditions that he is working to have addressed prior to his plea and sentencing in this case. On August 21, 2020, at 4:40 p.m., he is scheduled to have an MRI due to issues with his cervical spine, neck, and shoulders. However, his doctor has informed him that he cannot undergo an MRI with an ankle monitor. The MRI will take place at Kolb Radiology on Bainbridge Avenue in the Bronx. Should this request be granted, Mr. Reyes will follow whatever procedures the Court and Pretrial Services direct regarding the removal and replacement of his ankle monitor.

Hon. Valerie E. Caproni
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Respectfully submitted,

/s/ Ariel Werner
Ariel Werner
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cc: Juliana Murray, Assistant U.S. Attorney
Ashley Cosme, U.S. Pretrial Services Officer

Application GRANTED. Mr. Reyes may remove his ankle monitor on **August 21, 2020** to undergo an MRI at Kolb Radiology. Ms. Cosme is directed to contact Mr. Reyes to arrange for an appropriate procedure to remove and replace the monitor on August 21, 2020.

SO ORDERED.



8/18/2020

HON. VALERIE CAPRONI
UNITED STATES DISTRICT JUDGE